IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NEW YORK		JUL 1 2021 WESTERN DISTRICT OF NY
UNITED STATES OF AMERICA,		21-CR-6071-CJS
		<u>INFORMATION</u> (Felony)
- <i>vs</i> -		<b>Violation:</b> 18 U.S.C. §§ 922(a)(1)(A) and 2
HAKEEM MILLER,	Defendant.	(1 Count and Forfeiture Allegation)

#### COUNT 1

## (Dealing Firearms Without a License)

# The United States Attorney Charges That:

Between in or about April 2020, the exact date being unknown to the United States Attorney, and continuing thereafter up to and including on or about July 3, 2020, in the Western District of New York, the defendant, **HAKEEM MILLER**, not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully and unlawfully engage in the business of dealing firearms.

All in violation of Title 18, United States Code, Sections 922(a)(1)(A), 924(a)(1)(D) and 2.

### **FORFEITURE ALLEGATION:**

### The United States Attorney Alleges That:

Upon conviction of Count 1 of this Information, the defendant, **HAKEEM MILLER** shall forfeit to the United States, all of his right, title and interest in any firearm and ammunition involved or used in the commission of the offense, or found in the possession or

under the immediate control of the defendant at the time of arrest including, but not limited to:

- a. one (1) Kel-Tec CP33 .22 caliber pistol, bearing serial number M4E30, seized on or about July 3, 2020, during the execution of a search warrant for a gray Nissan Altima bearing Mississippi License Plate No. WRC9346 in Rochester, New York;
- b. one (1) Stoeger STR-9, 9mm semiautomatic pistol, bearing serial number T6429-20U05074, seized on or about July 3, 2020, during the execution of a search warrant for a gray Nissan Altima bearing Mississippi License Plate No. WRC9346, in Rochester, New York;
- c. one (1) Stoeger STR-9, 9mm semiautomatic pistol, bearing serial number T6429-20U05081, seized on or about July 3, 2020, during the execution of a search warrant for a gray Nissan Altima bearing Mississippi License Plate No. WRC9346, in Rochester, New York;
- d. one (1) Smith and Wesson SD40VE, .40 caliber pistol, bearing serial number FWR2776, seized on or about July 3, 2020, during the execution of a search warrant for a gray Nissan Altima bearing Mississippi License Plate No. WRC9346, in Rochester, New York;
- e. one (1) Taurus G2c, 9mm semiautomatic pistol, bearing serial number TLU21231, seized on or about July 3, 2020, during the execution of a search warrant for a gray Nissan Altima bearing Mississippi License Plate No. WRC9346, in Rochester, New York;
- f. one (1) Ruger SR9C, 9mm semiautomatic pistol, bearing serial number 336-53179, seized on or about July 3, 2020, during the execution of a search warrant for a Gray Nissan Altima bearing Mississippi License Plate No. WRC9346, in Rochester, New York;
- g. one (1) American Tactical Omni-Hybrid MZXX AR-15, .223 caliber rifle, bearing serial number NS245218, seized on or about July 3, 2020, during the execution of a search warrant for a Gray Nissan Altima bearing Mississippi License Plate No. WRC9346, in Rochester, New York;
- h. one (1) box of .40 caliber cartridges, seized on or about July 3, 2020, during the execution of a search warrant for a Gray Nissan Altima bearing Mississippi License Plate No. WRC9346, in Rochester, New York;

- i. twenty-three (23) .22 caliber cartridges, seized on or about July 3, 2020. during the execution of a search warrant for a Grav Nissan Altima bearing Mississippi License Plate No. WRC9346, in Rochester, New York;
- j. twenty-eight (28) rounds of 5.56 caliber cartridges, seized on or about July 3, 2020, during the execution of a search warrant for a Gray Nissan Altima bearing Mississippi License Plate No. WRC9346, in Rochester, New York;
- three (3) boxes of .22 caliber cartridges and miscellaneous firearm parts, k. seized on or about July 3, 2020, during the execution of a search warrant for a Gray Nissan Altima bearing Mississippi License Plate No. WRC9346, in Rochester, New York;
- 1. thirty-two (32) rounds of 9mm caliber cartridges, seized on or about July 3, 2020, during the execution of a search warrant for a Gray Nissan Altima bearing Mississippi License Plate No. WRC9346, in Rochester, New York; and
- one (1) 5.56 caliber extended magazine, seized on or about July 3, 2020, m. during the execution of a search warrant for a Gray Nissan Altima bearing Mississippi License Plate No. WRC9346, in Rochester, New York.

All pursuant to Title 18, United States Code, Sections 924(d) and 3665, and Title 28, United States Code, Section 2461(c).

DATED: Rochester, New York, July \_

JAMES P. KENNEDY, JR. United States Attorney

Western District of New York

BY:

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